



## **Economic Impact Analysis Virginia Department of Planning and Budget**

---

### **18 VAC 30-20 – Regulations Governing the Practice of Audiology and Speech-Language Pathology**

**Department of Health Professions**

June 21, 2008

---

### **Summary of the Proposed Amendments to Regulation**

The Board of Audiology and Speech-Language Pathology (Board) proposes to amend its regulations to make requirements for reinstatement of lapsed audiology and speech-language pathology licenses less restrictive. The Board also proposes to allow licensure by endorsement for individuals who hold a current license from another jurisdiction of the United States.

### **Result of Analysis**

The benefits likely exceed the costs for all proposed changes.

### **Estimated Economic Impact**

Currently, audiologists and speech-language pathologists may reinstate a lapsed license within four years of license expiration by paying a reinstatement fee and providing proof that they have completed 15 hours of continuing education for each year that the license has been lapsed (up to 60 hours total). Individuals whose licenses have lapsed for more than four years must meet all requirements for initial licensure in effect at the time of new application.

To gain initial licensure currently, audiologists must hold either: 1) a current and unrestricted certificate of clinical competence from the American Speech-Language-Hearing Association (ASHA), 2) a certification from the American Board of Audiology (ABA) or 3) certification from any other Board recognized accrediting body. Audiologists must also have passed a qualifying examination from a Board recognized accrediting body within three years of the date of initial licensure application or have actively practiced their profession during one of the past three consecutive years. In general, speech-language pathologists must hold a doctoral

degree from a speech-language program accredited by ASHA (or an equivalent accrediting body) and must have passed a qualifying examination within three years of the date of initial licensure application or have actively practiced their profession during one of the past three consecutive years. School speech-language pathologists need only hold a master's degree in speech-language pathology and hold an endorsement in their field from the Virginia Department of Education.

The Board proposes to amend reinstatement of lapsed license requirements so that licensees may reinstate their licenses within five (rather than four) years. The Board also proposes to allow all licensees the option of reapplying for licensure when their Virginia licenses has lapsed for more than five years if they can show proof of completion of 60 hours of continuing education since their license lapsed, have a current license from another jurisdiction in the United States and have actively practiced their profession for at least three of the past five years. Additionally, the Board proposes to allow audiologists whose licenses have lapsed for more than five years to practice under supervision with a provisional license for six months. After that six month period, with their supervisors' recommendation, provisionally licensed audiologists may reinstate their original license. To gain provisional licensure, an applicant must meet the educational requirements for initial licensure and must have passed a qualifying exam when they were initially licensed. The fee for application for provisional licensure is \$50.

Under these proposed regulations, individuals will have one more year than they currently do to reinstate their licenses and may be able to avail themselves of several other paths, depending on what type of license they hold and whether they have been working in another state, to bring their licenses current without going through the expense of initial licensure again. Specifically, licensees who meet any of the criteria for reinstating a lapsed license will not have to bear the direct and indirect costs of preparing for, and taking, a qualifying examination. These costs would include the fee required to take the exam (\$80) as well as the price of any study materials that would need to be purchased and the value of the time spent on studying and taking the exam. Because these changes will likely lower the cost of reinstatement of Virginia licensure for audiologists and speech-language pathologists with lapsed licenses, a slightly greater number of these individuals may choose to reinstate licensure. To the extent that this slightly increases the pool of audiologists and speech-language pathologists practicing in the Commonwealth, the cost of their services may be slightly reduced. Consumers will likely benefit

from having greater choice as to whom they see for these services and may also see costs for these services reduced.

Current regulations do not have a special provision for audiologists and speech language pathologists who are licensed in another political jurisdiction but want to begin practicing in Virginia. Currently, these individuals would have to apply for initial licensure and meet all the requirements listed above.

The Board proposes to allow licensure by endorsement for individuals who hold current licensure in another state or United States territory. Individuals who are to be licensed under this provision must provide evidence of a current license and must have actively practiced their profession for three of the last five years. Individuals who do not meet these criteria, but who want to be licensed by endorsement in audiology, may follow the same provisional licensure path that is available to individuals whose Virginia licenses have lapsed for longer than five years.

Applicants for Virginia licensure who are currently licensed in another jurisdiction will likely benefit from this regulatory change because they will likely be able to avoid the expense of retaking an exam that they have already passed. Because these changes will likely lower the cost of Virginia licensure for audiologists and speech-language pathologists coming from other political jurisdictions, a slightly greater number of these individuals may seek licensure. To the extent that this slightly increases the pool of audiologists and speech-language pathologists practicing in the Commonwealth, the cost of their services may be slightly reduced. Consumers will likely benefit from having greater choice as to whom they see for these services and may also see costs for these services reduced.

## **Businesses and Entities Affected**

These regulatory changes will affect all audiologists and speech-language pathologists licensed by the Board and any audiologists and speech-language pathologists who are licensed by another state or U.S. Territory but who want to gain Virginia licensure. The Department of Health Professions (DHP) reports that the Board currently licenses 413 audiologists and 2408 speech-language pathologists.

## **Localities Particularly Affected**

No locality will be particularly affected by this proposed regulatory action.

## **Projected Impact on Employment**

This regulatory action may slightly increase the number of audiologists and speech-language pathologists licensed by the Commonwealth. To the extent that these individuals practice independently, employment in these fields will likely be slightly increased.

## **Effects on the Use and Value of Private Property**

To the extent that this regulatory action slightly decreases the cost of hiring audiologists and speech-language pathologists, firms that employ these professionals may see a very slight increase in the value of their businesses.

## **Small Businesses: Costs and Other Effects**

Small businesses in the Commonwealth are unlikely to incur any costs on account of this regulatory action but may see some cost savings cost savings..

## **Small Businesses: Alternative Method that Minimizes Adverse Impact**

Small businesses in the Commonwealth are unlikely to incur any costs on account of this regulatory action.

## **Real Estate Development Costs**

This regulatory action will likely have no effect on real estate development costs in the Commonwealth.

## **Legal Mandate**

The Department of Planning and Budget (DPB) has analyzed the economic impact of this proposed regulation in accordance with Section 2.2-4007.H of the Administrative Process Act and Executive Order Number 36 (06). Section 2.2-4007.H requires that such economic impact analyses include, but need not be limited to, the projected number of businesses or other entities to whom the regulation would apply, the identity of any localities and types of businesses or other entities particularly affected, the projected number of persons and employment positions to be affected, the projected costs to affected businesses or entities to implement or comply with the regulation, and the impact on the use and value of private property. Further, if the proposed

regulation has adverse effect on small businesses, Section 2.2-4007.H requires that such economic impact analyses include (i) an identification and estimate of the number of small businesses subject to the regulation; (ii) the projected reporting, recordkeeping, and other administrative costs required for small businesses to comply with the regulation, including the type of professional skills necessary for preparing required reports and other documents; (iii) a statement of the probable effect of the regulation on affected small businesses; and (iv) a description of any less intrusive or less costly alternative methods of achieving the purpose of the regulation. The analysis presented above represents DPB's best estimate of these economic impacts.